

# Stanislaus County

EMERGENCY DISPATCH

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FEDERAL COMMUNICATIONS COMMISSION  
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March 30, 1993

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FCC MAIL ROOM

Ms. Donna Searcy, Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, DC 20554

Re: PR Docket 92-235

Dear Ms. Searcy:

As the provider of Dispatch and Communication Support Services for seven Law Enforcement Agencies and nineteen Fire Departments, I would respectfully like to submit comments on the Refarming Proposal.

My department provides communications for public safety in a largely rural area of the San Joaquin Valley in Central California. We provide communications coverage for an area of more than 1520 square miles. A required reduction in output power could, in most instances, reduce coverage to below acceptable levels of signal for the day-to-day operation of our public safety agencies. Also, further reduction in allowable levels of modulation will degrade the signal-to-noise ratio, will reduce the effectiveness of our present system.

Based on the best information available to us, virtually none of our existing radio communication system could effectively be converted or modified to meet the new technical standards. Much of this equipment is relatively new, having been purchased in the last five years. "Narrow banding" or reducing channel bandwidth will render our new equipment, as well as older equipment, obsolete and unusable. Furthermore, any purchase of equipment for replacement to meet new standards is out of the question given the current fiscal situation facing local government in California. Funding is marginal at best for required maintenance to keep our existing systems operational.

The elimination of service block frequency allocations will further complicate an already complex system of coordination. With the proliferation of communications system needs in the public sector, APCO and IMSA currently have a tremendous responsibility to manage specific blocks of spectrum. This would be adversely

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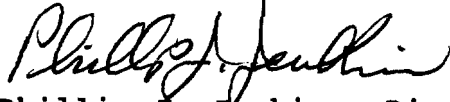
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affected by removing or substantially altering the management system now in place.

The individual, not to mention cumulative effects, of "Refarming" could be disastrous to local government agencies. Make no mistake that funding is not now present, nor does it appear that it will be in the future, to substantially retrofit, modify, or replace current equipment operated by the local government agencies in California. Please register my opposition, and that of my agency, to the "Refarming" proposal currently under consideration by the Federal Communication Commission.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Phillip J. Jenkins".

Phillip J. Jenkins, Director  
Stanislaus County Emergency Dispatch  
1100 H Street, Modesto, CA. 95354